

[COUNSEL LISTED ON SIGNATURE PAGE]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

LASER DESIGN INTERNATIONAL, LLC and  
NORWOOD OPERATING COMPANY,

Plaintiffs,

v.

BJ CRYSTAL, INC., a California corporation;  
CRYSTAL MAGIC, INC., a Florida  
corporation; U.C. LASER, INC., a New Jersey  
corporation; VITRO LASER GROUP U.S.A.,  
INC., a Nevada corporation; JIMAC  
MARKETING, INC., a Canadian corporation;  
CONCORD INDUSTRIES, INC., a Connecticut  
corporation; CERION GMBH, a German limited  
liability company; CRYSTAL CAPTURE INC.,  
a Texas corporation; CRYSTAL CAPTURE  
INTERNATIONAL, LLC, a Nevada limited  
liability company; G.W. PARTNERS  
INTERNATIONAL, INC., a California  
corporation; VITRO LASER GMBH, a German  
limited liability company; VITRO  
INTERNATIONAL, LLC, a Nevada limited  
liability company; VITRO USA, LLC, a Nevada  
limited liability company; MERITAGE  
GRAPHICS, INC., a Nevada corporation;  
CRYSTAL LASER CONCEPTS, LTD., a  
Nevada limited liability company; 3DLI, Inc., a  
Nevada corporation; ART GOLDMAN; SCOTT  
STANKO; OTHMAR VAN DAM; and DOES  
1-19,

Defendants.

AND RELATED COUNTERCLAIMS

Lead Case No. C 03-1179 JSW (MEJ)  
Consolidated with No. C 03-3905 JSW

**STIPULATION AND [PROPOSED]  
ORDER ALLOWING AMENDMENT OF  
DEFENDANT CRYSTAL MAGIC, INC.'S  
ANSWER TO SECOND AMENDED  
COMPLAINT**

1 By and through counsel, Plaintiffs and defendant Crystal Magic, Inc. ("Crystal Magic")  
2 stipulate as follows:

3 1. Crystal Magic may file an amendment to its Answer to Plaintiffs' Second Amended  
4 Complaint, in the form of the attached Exhibit A, to add a Sixth Affirmative Defense.  
5 Correspondingly, Crystal Magic agrees to provide certain discovery, relating to this defense, as  
6 set forth herein.

7 2. Crystal Magic will provide responses and objections to Document Requests, in the  
8 form of the attached Exhibit B, and responsive, non-privileged documents will be produced, and  
9 privilege documents will be placed on a privilege log, within 30 days.

10 3. Crystal Magic will provide verified responses and objections to special interrogatories,  
11 in the form of Exhibit C, within 30 days. These special interrogatories will not count towards the  
12 limit on interrogatories, as that limit relates to interrogatories that are served on all of the  
13 defendants in this case.

14 4. Crystal Magic will provide a representative for a deposition, pursuant to Rule 30(b)(6)  
15 of the Federal Rules of Civil Procedure, on the topic of its Sixth Affirmative Defense. This  
16 deposition will take place in the offices of Cooley Godward LLP, San Francisco, California, prior  
17 to earlier of (1) the next mediation for this case or, (2) this case's discovery cut-off date.

18 5. Crystal Magic will file an amendment to its Answer to Plaintiffs' Second  
19 Amended Complaint, in the form of the attached Exhibit A, within 5 days from the date of entry  
20 of this Stipulation and ~~Proposed~~ Order by the Court.

21 Dated: January 30, 2006

22 COOLEY GODWARD LLP

23  
24  
25 By: /s/  
26 Brian E. Mitchell  
27 Attorneys for Plaintiffs  
28 LASER DESIGN INTERNATIONAL, LLC  
and NORWOOD OPERATING COMPANY

1 Dated: January 30, 2006

2 PERKINS COIE LLP

3  
4  
5 By: /s/  
Kenneth B. Wilson  
6 Attorneys for Defendants  
BJ Crystal, Inc., Crystal Magic, Inc., Crystal  
7 Capture, Inc., Concord Industries, Inc.,  
Jimac Marketing, Inc., U.C. Laser, Inc.,  
8 Cerion GmbH, Vitro Laser GmbH and  
Meritage Graphics, Inc.

9  
10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11  
12  
13 Dated: February 1, 2006

14  
15 By:   
16 HONORABLE JEFFREY S. WHITE  
United States District Judge